

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

EDWARD J. KOELLER, individually and)	
on behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	Case No. 4:25-cv-00641
v.)	
)	
OX APPSEC SECURITY LTD.,)	
)	
Defendant.)	
)	

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING**

With the consent of Plaintiff, OX Appsec Security, Inc. (erroneously named as OX Appsec Security Ltd.) (“OX App” or “Defendant”) respectfully requests an extension of time, through August 7, 2025, to file a responsive pleading to Plaintiff’s Class Action Complaint (ECF No. 1, “Complaint”). In support of this Consent Motion, Defendant states:

1. Plaintiff filed his Complaint in this matter on May 6, 2025. ECF No. 1.
2. Plaintiff served the Complaint on Defendant OX Appsec Security Ltd. on May 19 2025. ECF No. 3.
3. The current deadline for Defendant to file a responsive pleading was June 5, 2025. *Id.*, Fed. R. Civ. P. 12(a)(1)(A)(i).
4. OX Appsec Security Ltd., who was erroneously named as Defendant, is located in the country of Israel, which is currently experiencing wartime conditions. This has hampered the investigation of the facts of the case which will enable Defendant to respond to the Complaint.
5. Accordingly, Plaintiff has consented to extend this deadline until August 7, 2025.

6. Counsel for Defendant has begun diligently working to review Plaintiff's allegations in order to prepare a response to the Complaint. Defendant requests this extension to complete that review and prepare and file a responsive pleading. This is Defendant's first request for an extension.

7. By filing this Consent Motion, Defendant does not waive and expressly reserves all objections, including objection to personal jurisdiction.

8. This Consent Motion is made in good faith and granting it will not prejudice any party.

WHEREFORE, Defendant respectfully requests the Court grant this Consent Motion and enter an order extending Defendant's responsive pleading deadline through August 7, 2025.

Dated: June 23, 2025

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

By: /s/ Darci F. Madden

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Attorney for Defendant OX Appsec Security Ltd.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed on this 23rd day of June via the court's electronic filing system which will service notice to all counsel of record.

/s/ Darci F. Madden